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5 Attorneys for Plaintiff  
6 MUMTAZ SHEREEN SUHAIL

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MUMTAZ SHEREEN SUHAIL,

Case No. C 06-03424 MHP

Plaintiff,

v.

STIPULATION AND PROPOSED ORDER  
CONTINUING THE INITIAL CASE  
MANAGEMENT CONFERENCE

NAVIGANT INTERNATIONAL, INC.; TQ3  
NAVIGANT; TQ3 TRAVEL SOLUTIONS;  
and DOES 1 through 50, inclusive,

Defendants.

IT IS HEREBY STIPULATED AND AGREED UPON by the parties and their respective counsel of record that the initial case management conference ("CMC") be continued from November 27, 2006 until January 8, 2007 at 4:00 p.m. in Courtroom 15, 18<sup>th</sup> Floor, San Francisco, California. The parties agree that the following constitutes good cause to continue the initial CMC:

- The parties have been continuing substantial meet and confer efforts since the last continuance of the Initial Case Management Conference in attempts to resolve disputes by entering into a stipulation, which calls for amendment of the complaint (including amending named defendants), dismissal without prejudice of certain defendants, and a statute of limitations tolling agreement during the pendency of this litigation. The parties have tentatively finalized a stipulation and the stipulation is awaiting approval of defendant Navigant Southwest LLC.

- 1           • The parties request that the CMC be continued for 30 days, until the next available  
2           court date of January 8, 2007, to file the stipulation, amend the complaint, and to  
3           allow the amended defendant Navigant Southwest LLC to file an answer.  
4           • The parties are not making this request for the purposes of any delay. Instead, the  
5           parties are making this request to avoid unnecessary motion practice, including  
6           motions to dismiss and/or summary judgment, that would unduly burden the Court  
7           with legal issues that are being resolved by the parties, including unnecessary  
8           attorneys' fees and costs in litigating this dispute.

9           SO STIPULATED.

10          Dated: November 20, 2006

KAHN BROWN & POORE LLP

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12          By: \_\_\_\_\_  
13           David M. Poore  
14           Attorneys for Plaintiff

15          Dated: November 20, 2006

MANATT PHELPS & PHILLIPS LLP

16            
17          By: \_\_\_\_\_  
18           Andrew Satenberg  
19           Attorneys for Defendants

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**[PROPOSED] ORDER**

**IT IS SO ORDERED.** The initial case management conference is continued from November 27, 2006, at 4:00 p.m. in Courtroom 15, 18<sup>th</sup> Floor, San Francisco, California, to January 8, 2007, at 4:00 p.m. in Courtroom 15, 18<sup>th</sup> Floor, San Francisco, California.

Dated: 11/27/06

